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April 10, 2015

BY ECF and EMAIL

Hon. J. Paul Oetken Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

Re: <u>United States v. James Meyer</u>, 13-CR-604-01 (JPO)

Dear Judge Oetken:

We represent James Meyer in the above-captioned matter. On August 27, 2014, Mr. Meyer pleaded guilty to one count of interstate transportation of stolen property in connection with the sale and transportation of certain artworks by Jasper Johns. Sentencing is currently scheduled for April 23, 2015. Mr. Meyer's sentencing submission was filed on January 9, 2015, and the Government's submission is due April 17, 2015. We write to update the information contained in our previously filed sentencing submission





Finally, Mr. Meyer continues to work to support himself and his family, and hopes to one day be in a position to repay all of the financial obligations that will be part of his sentence.² He has used his carpentry skills to find work offering home repairs and furniture refinishing to members of his community, including hanging doors and installing window moldings and floors. He also builds frames for other artists' paintings, and so far has made approximately twenty frames for a local artist. Since our previous submission, Mr. Meyer has completed multiple licensing programs so that he can engage in additional paid work to supplement his earnings from carpentry. He has applied for and will soon receive his Limited Master License from the Coast Guard, as well as his CPR/AED and First Aid certifications from the Red Cross, which will allow him to gain employment captaining local inspected vessels close to shore. He is also in the process of completing a certification in motorcycle instruction so that he can further supplement his earnings.

Throughout this post-pleading period, and to date, Mr. Meyer has continued the volunteer efforts in which he has been engaged for many years now, all of which were detailed in our original submission. He has recently started contributing his carpentry skills to the local chapter of Habitat for Humanity, as they are in great need of skilled labor. He has also continued to abide by all of the conditions of his pre-trial release, as he has done consistently in the more than two years since his arrest.

Jim Meyer is deeply remorseful for what he has done and will regret his decisions for the rest of his life. It is his continued hope that his efforts to make the victims whole will succeed to

We respectfully reiterate our request that the Court consider a sentence of probation or home confinement so that Mr. Meyer can continue to work to support his family and make the victims of his conduct whole.

the fullest extent possible. We respectfully ask the Court to consider such factors, along with the factors identified in our prior submission, when determining the sentence that is appropriate in this case.

Sincerely,

WILSON SONSINI GOODRICH & ROSATI Professional Corporation

s/ Morris J. Fodeman Morris J. Fodeman

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